

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**BRENDA STEVENSON,**  
**Plaintiff**

**V.**

**TYSON FOODS, INC.**  
**Defendant.**

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**CIVIL ACTION NO. 2:18-cv-00367 JRG**

**PLAINTIFF'S NOTICE OF TRIAL WITNESSES**

Plaintiff Brenda Stevenson, through the undersigned counsel, makes these Disclosures of Trial Witnesses in compliance with the Court's Docket Control Order dated November 20, 2018 [Doc 12].

1. Brenda Stevenson  
Plaintiff - She will testify live as to the circumstances of the incidents made the basis of this lawsuit and her resulting injuries and damages. Anticipated time 45 minutes.
2. Contetta (Contetter) Jackson  
Plaintiff's supervisor at Tyson - She is expected to testify live as to her knowledge concerning Tyson's policies and procedures, working conditions at the Tyson facility, the incidents made the basis of this lawsuit, Plaintiff's job duties, work performance and training received, and Plaintiff's claim for worker's compensation benefits. Anticipated time 45 minutes.
3. Crystal Koltonski, LVN  
Nurse at Defendant's facility - She is expected to testify live as to her knowledge concerning Tyson's policies and procedures, working conditions at the Tyson facility, medical treatment and assessment provided to Plaintiff both prior to and subsequent to the incident made the basis of this lawsuit, the incidents made the basis of this lawsuit, Plaintiff in general, her health condition both prior to and subsequent to the incident at issue, and Plaintiff's claim for worker's compensation benefits. Anticipated time 15 mins.
4. Amber Dodd  
Human Resources Manager and a benefits counselor at Defendant's facility - She is expected to testify live as to her knowledge concerning Tyson's policies and procedures, including but not limited to Tyson's personnel and employee policies in general, the incidents made the basis of this lawsuit, Plaintiff in general and her

hiring, orientation, disciplinary history, pay and employment status, and Plaintiff's claim for worker's compensation benefits. Anticipated time 15 mins.

5. Martha Ventura  
Human Resources employee and benefits counselor at Defendant's facility - She is expected to testify live as to her knowledge concerning Tyson's policies and procedures, including but not limited to Tyson's personnel and employee policies in general, the incidents made the basis of this lawsuit, Plaintiff in general as well as her hiring, orientation, disciplinary history, pay and employment status, and Plaintiff's claim for worker's compensation benefits. Anticipated time 15 mins.
6. Jason Orsak  
Complex Safety Manager at Defendant's facility - He is expected to testify live as to his knowledge of Defendant's policies and procedures, including but not limited to Tyson's safety policies in general, the incidents made the basis of this lawsuit, Plaintiff's claim for worker's compensation benefits, Plaintiff in general and the safety training she received, the configuration and design of the area at the facility where the initial incident occurred, the Ergo platform at issue and the issue of handrails in the debone cone lines . Anticipated time 15 mins.
7. Mary L. McCollister (McAllister)  
Employee of Defendant and former supervisor of Plaintiff - She is expected to testify live as to her knowledge of Tyson's policies and procedures and of Plaintiff in general and her assigned work duties and work performance. Anticipated time 15 mins.
8. Jessica Gatlin, RN  
Acting Nurse Manager at Tyson's facility - She is expected to testify live as to her knowledge concerning Tyson's policies and procedures, working conditions at the Tyson facility, medical treatment and assessment provided to Plaintiff both prior to and subsequent to the incident made the basis of this lawsuit, the incidents made the basis of this lawsuit, Plaintiff in general, her health condition both prior to and subsequent to the incident at issue, and Plaintiff's claim for worker's compensation benefits. Anticipated time 15 mins.
9. Cynthia Brinson  
Employee of Defendant and former supervisor of Plaintiff - She is expected to testify live as to her knowledge of Tyson's policies and procedures and of Plaintiff in general and her assigned work duties and work performance. Anticipated time 15 mins.

10. Leland Chavez  
Human Resources employee at Defendant's facility - He is expected to testify live as to his knowledge of Tyson's policies and procedures, including but not limited to Tyson's personnel and employee policies in general, and of Plaintiff in general and her assigned work duties, hiring, orientation, disciplinary history, pay, employment status and work performance. Anticipated time 15 mins.
11. Raymond Harper  
Employee of Defendant and former supervisor of Plaintiff - He is expected to testify live as to his knowledge of Tyson's policies and procedures, and of Plaintiff in general and her work performance. Anticipated time 15 mins.
12. Tameika Maxwell-Rector  
Human Resources employee at Defendant's facility - She is expected to testify live as to her knowledge of Tyson's policies and procedures, including but not limited to Tyson's personnel and employee policies in general, and of Plaintiff in general and her hiring, orientation, disciplinary history, pay, and employment status. Anticipated time 15 mins.
13. Coty D. Mitchell  
Employee of Defendant and former supervisor of Plaintiff - He is expected to testify live as to his knowledge of Tyson's policies and procedures, and of Plaintiff in general and her work performance. Anticipated time 15 mins.
14. Clyde Dismuke, Jr.  
Human Resources employee at Defendant's facility - He is expected to testify live as to his knowledge of Tyson's policies and procedures, including but not limited to Tyson's personnel and employee policies in general, and of Plaintiff in general and her hiring, orientation, disciplinary history, pay, and employment status. Anticipated time 15 mins.
15. Carolyn Moore  
Human Resources employee at Defendant's facility - She is expected to testify live as to her knowledge of Tyson's policies and procedures, including but not limited to Tyson's personnel and employee policies in general, and of Plaintiff in general and her hiring, orientation, disciplinary history, pay, and employment status. Anticipated time 15 mins.
16. Christian "Chrissy" Rains, LVN  
Nurse at Tyson's facility - She is expected to testify live as to her knowledge concerning Tyson's policies and procedures, working conditions at the Tyson facility, medical treatment and assessment provided to Plaintiff both prior to and subsequent to the incident made the basis of this lawsuit, the incidents made the basis of this lawsuit, Plaintiff in general, her health condition both prior to and

subsequent to the incident at issue, and Plaintiff's claim for worker's compensation benefits. Anticipated time 15 mins.

17. Cordelia Ross  
Employee of Defendant and former supervisor of Plaintiff - She is expected to testify live as to her knowledge of Tyson's policies and procedures, of Plaintiff in general and her work performance, the incidents made the basis of this lawsuit, and Plaintiff's claim for worker's compensation benefits. Anticipated time 15 mins.
18. Reginald Turner  
Employee of Defendant and former supervisor of Plaintiff - He expected to testify live as to his knowledge of Tyson's policies and procedures, and of Plaintiff in general and her work performance. Anticipated time 15 mins.
19. Sarah Waller, LVN  
Nurse at Defendant's facility - She is expected to testify live as to her knowledge concerning Tyson's policies and procedures, working conditions at the Tyson facility, medical treatment and assessment provided to Plaintiff both prior to and subsequent to the incident made the basis of this lawsuit, the incidents made the basis of this lawsuit, Plaintiff in general, her health condition both prior to and subsequent to the incident at issue, and Plaintiff's claim for worker's compensation benefits. Anticipated time 15 mins.
20. Benjamin Leggio, M.D.  
Plaintiff's treating physician - He is expected to testify either live or by video deposition as to Plaintiff's medical treatment, cost of her treatment, injuries, diagnosis, prognosis and causation. Anticipated time 45 mins.
21. Pattie Sepulvado  
Co-worker/Friend of Plaintiff - She is expected to testify live as to her knowledge of the injuries and damages Plaintiff suffered. Anticipated time 15 mins.
22. Sherri Boyd  
Co-worker/Friend of Plaintiff - She is expected to testify live as to her knowledge of the injuries and damages Plaintiff suffered. Anticipated time 15 mins.
23. Susan Bray  
Friend of Plaintiff - She is expected to testify live as to her knowledge of the injuries and damages Plaintiff suffered. Anticipated time 15 mins.
24. Patricia Stevenson  
Sister of Plaintiff - She is expected to testify live as to her knowledge of the injuries and damages Plaintiff suffered. Anticipated time 15 mins.

Dated this 3rd day of April, 2019.

Respectfully submitted,

**THE LAW OFFICE OF  
DANIEL D. HOROWITZ, III, PC**

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served upon all counsel of record pursuant to the Federal Rules of Civil Procedure on this the 3rd day of April, 2019.

**/s/ DANIEL D. HOROWITZ, III**

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